

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES,  
INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DECLARATION OF ROBERT C. GILL IN SUPPORT OF DEFENDANTS'  
MOTION FOR RELIEF UNDER PROTECTIVE ORDER AND OTHER RELIEF**

1. I am an attorney at Saul, Ewing, Arnstein & Lehr LLP, counsel for Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together “Castle Hill”). I was admitted *pro hac vice* in this matter on October 27, 2017.

2. Attached as **Exhibit A** is a true and correct copy of correspondence from R. Gill to P. Swanson dated July 29, 2019.

3. Attached as **Exhibit B** are true and correct copies of excerpts from the Motion Hearing before Judge Jayne on December 6, 2017.

4. Attached as **Exhibit C** are true and correct copies of excerpts from the 30(b)(6) deposition of Alan Roireau dated August 1, 2018.

5. Attached as **Exhibit D** are true and correct copies of excerpts from the deposition of Zachary Schmid dated June 20, 2018.

6. Attached as **Exhibit E** is a true and correct copy of correspondence from R. Gill to G. Rubman dated May 10, 2019.

7. Attached as **Exhibit F** is a true and correct copy of correspondence from P. Swanson to R. Gill dated July 31, 2019.

8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 6, 2019 in Charlottesville, Virginia.

/s/ Robert C. Gill  
Robert C. Gill

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of August, 2019, I caused an copy of the foregoing  
**DECLARATION OF ROBERT C. GILL IN SUPPORT OF DEFENDANTS'  
MOTION FOR RELIEF UNDER PROTECTIVE ORDER AND OTHER RELIEF**  
to be served via the Court's CM/ECF filing system and served to the following counsel for Plaintiff

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/s/ Robert C. Gill

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